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Attorney for Defendant

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OREGON**

**UNITED STATES OF AMERICA,**

**Plaintiff,**

**v.**

**HUGO BERTEAU-PAVY,**

**Defendant**

**Case No. 3:20-cr-00434-HZ**

**DECLARATION OF COUNSEL IN  
SUPPORT OF UNOPPOSED MOTION  
TO CONTINUE TRIAL DATE**

I, Gerald M. Needham, declare:

1. I am counsel for Hugo Berteau-Pavy in the above-entitled action.
2. Mr. Berteau-Pavy has been indicted for one count of Civil Disorder in violation of 18 U.S.C. § 231(a)(3).
3. Mr. Berteau-Pavy has been released on pretrial conditions and is in compliance with any conditions required of him. He is fully employed.
4. Mr. Berteau-Pavy has authorized counsel to represent he consents to the continuance with the knowledge that the timeframe is excludable under the Speedy Trial Act pursuant to 18 U.S.C. § 3161(h)(7)(A).

5. Mr. Berteau-Pavy has been charged in Multnomah County with Unlawful Directing Light from a Laser Pointer, which arises out of the same incident in the federal indictment. A resolution of the state charges will materially affect the resolution of the federal charges. Counsel believes that the state charges may be resolved in the timeframe contemplated by moving to continue the trial date.
6. Also pending before the Court is defendant's Motion to Dismiss (ECF 20). Counsel also moves to require the government to respond to defendant's motion to dismiss on or before August 17, 2021, with the defendant's reply to be filed by August 31, 2021.
7. Additionally, counsel is in need of more time to conduct legal research, consult with Mr. Berteau-Pavy, determine what additional motions, if any, may need be filed, otherwise properly prepare for trial.
8. Assistant United States Attorney Tom Ratcliffe has authorized counsel to represent the government has no objection to the requested continuance.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct; that the statements set forth above are based on my own knowledge, except where otherwise indicated, and I believe those statements to be true; and that this declaration was executed on May 12, 2021, in Portland, Oregon.

/s/ Gerald M. Needham  
Gerald M. Needham  
Attorney for Defendant